1 The Honorable Kymberly K. Evanson 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 UNITED STATES OF AMERICA, ex rel. CASE NO. 2:21-cv-0410-KKE KUSHWINDER SINGH. 10 STIPULATED MOTION AND ORDER Plaintiff. FOR EXTENSION OF THE TIME 11 FOR DEFENDANT ALEDADE, INC. TO RESPOND TO THE COMPLAINT v. 12 ALEDADE, INC., et. al., NOTE ON MOTION CALENDAR: 13 **JUNE 5, 2024** Defendants. 14 15 Plaintiff Kushwinder Singh ("Plaintiff") and Defendant Aledade, Inc. ("Defendant") 16 (collectively, "the Parties"), by and through their counsel of record, respectfully submit this 17 Stipulation, and respectfully request that the Court enter the proposed order for an extension of 18 time for Defendant to respond to Plaintiff's Complaint. 19 1. On January 10, 2024, the Court unsealed the Amended Complaint against 20 Defendant in the above-captioned action. (Dkt. No. 24). 21 2. On April 8, 2024, Defendant executed a Waiver of the Service of Summons. (Dkt. 22 No. 27). 23 3. Defendant's deadline to respond to Plaintiff's Complaint is June 7, 2024. 24 4. The Parties are engaged in discussions regarding whether they may streamline and 25 narrow the litigation. 26 27 STIPULATED MOTION AND ORDER FOR EXTENSION OF THE TIME TO RESPOND TO COMPLAINT - 1 Corr Cronin, LLP (No. 2:21-cy-0410-KKE) 1015 Second Avenue, Floor 10

Seattle, WA 98104-1001

(206) 625-8600

1	5. An extension would further judicial economy and no party will be prejudiced by an
2	extension.
3	6. The Parties jointly request a 45-day extension of Defendant's deadline to respond
4	to the Complaint to facilitate these discussions.
5	7. Accordingly, the Parties stipulate and respectfully request to extend Defendant's
6	deadline to respond to Plaintiff's Complaint to July 22, 2024. A proposed order is subjoined
7	herewith.
8	DATED this 5th day of June, 2024. I certify that this memorandum contains 173 words,
9	in compliance with the Local Civil Rules.
10	Respectfully submitted,
11	
12	By: <u>/s/ Stephen Teller</u> By: <u>/s/ Jeffrey B. Coopersmith</u>
13	Stephen Teller Jeffrey B. Coopersmith, WSBA No. 30954 TELLER LAW CORR CRONIN, LLP
14	300 Lenora St., #1471 1015 Second Avenue, Floor 10 Seattle, WA 98121 Seattle, WA 98104-1001
15	(206) 324-8969 (206) 625-8600 Steve@stellerlaw.com jcoopersmith@corrcronin.com
16	Attorney for Plaintiff Brian P. Dunphy (Pro Hac Vice forthcoming)
17	Kushwinder Singh Nicole E. Henry (Pro Hac Vice forthcoming) MINTZ, LEVIN, COHN, FERRIS,
18	GLOVSKY AND POPEO, P.C. One Financial Center
19	Boston, MA 02111 (617) 542-6000
20	BDunphy@mintz.com NEHenry@mintz.com
21	Karen S. Lovitch ( <i>Pro Hac Vice</i> forthcoming)
22	MINTZ, LEVIN, COHN, FERRIS, GLOVSKY AND POPEO, P.C.
23	555 12th Street NW Suite 1100
24	Washington, DC 20004 (202) 434-7300
25	kslovitch@mintz.com
26	Attorneys for Defendant Aledade, Inc.
27	
	STIPULATED MOTION AND ORDER FOR EXTENSION OF THE TIME TO RESPOND TO COMPLAINT - 2  Corr Cronin, LLP

(No. 2:21-cv-0410-KKE)

**ORDER** IT IS SO ORDERED. DATED this 5th day of June, 2024. Hymberly X Eanson Kymberly K. Evanson United States District Judge 

STIPULATED MOTION AND ORDER FOR EXTENSION OF THE TIME TO RESPOND TO COMPLAINT - 3 (No. 2:21-ev-0410-KKE)